

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

IN RE TESLA INC. STOCKHOLDER
DERIVATIVE LITIGATION

Lead Case No.: 1:22-cv-00592-LY

(Consolidated with Case No. 1:22-cv-
00611- LY)

This Document Relates To:

All Cases

MOTION FOR ADMISSION *PRO HAC VICE*

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Rebecca Lockert, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, and Linda Johnson Rice, and Nominal Defendant Tesla, Inc. in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and a member of the law firm Freshfields Bruckhaus Deringer US LLP, with offices at:

Mailing address: 601 Lexington Avenue, 31st Floor
New York, NY 10022

Telephone: (212) 277-4000

Facsimile: (212) 277-4001

Email: rebecca.lockert@freshfields.com

2. Since December 18, 2020, Applicant has been and presently is a member of and in good standing with the Bar of New York. Applicant's New York bar license number is 5776885.

3. Applicant has been admitted to practice before the following courts:

Court:

Admission date:

U.S. District Court for the Eastern District of New York September 9, 2022

4. Applicant is presently an active member in good standing of the courts listed above.

5. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.

6. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses (omitting minor traffic offenses).

7. Applicant has read and is familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

8. Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the Western District of Texas.

Co-counsel: Gary Ewell
 TX Bar No. 06752800

Mailing address: 111 Congress Avenue, Suite 2800
 Austin, Texas 78701

Telephone: (512) 770-4030

Facsimile: (877) 851-6384

Email: gewell@ebbklaw.com

9. Should the Court grant applicant's motion, Applicant shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-1(f)(2), with checks made payable to: Clerk, U.S. District Court.

10. Should the Court grant applicant's motion, Applicant shall register as a filing user within 10 days of this order, pursuant to the Administrative Policies and Procedures for Electronic Filing in Civil and Criminal Cases in the Western District of Texas.

WHEREFORE, Applicant prays that this Court enter an Order permitting the admission of Doru Gavril to the Western District of Texas *pro hac vice* for this case only.

Dated: October 27, 2022

Respectfully submitted,



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Attorney for Defendants Elon Musk, Robyn Denholm, Kimbal Musk, Ira Ehrenpreis, James Murdoch, Lawrence J. Ellison, Kathleen Wilson-Thompson, Hiromichi Mizuno, Antonio J. Gracias, Stephen T. Jurvetson, Brad W. Buss, and Linda Johnson Rice, and Nominal Defendant Tesla, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this 1st day of November, 2022.

/s/ Rebecca Lockert

Rebecca Lockert